Case 24-22690-JAD Doc 56 Filed 03/31/25 Entered 03/31/25 10:58:55 Desc Mair Document Page 1 of 1

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Benito Rojas, : Bankruptcy Case No. 24-22690-JAD

.

Debtor. : Chapter 13

Benito Rojas,

Document No.: 56

Movant,

Related to Document No.:

:

Related to Claim No.: 5

Citizens Bank, N.A. sbm to Citizens:

v.

Bank of PA,

:

Respondent.

## **DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on March 17, 2025, after reasonable investigation and upon review of the Chapter 13 Plan, it appears to Debtor that the that the payment is sufficient to fund the Chapter 13 Plan even with the proposed change for April 7, 2025.

The new post-petition monthly payment payable to Respondent is \$306.07, effective April 7, 2025, per the notice dated March 17, 2025. The Debtor's Plan payment provides for a monthly payment to Citizens Bank, N.A. sbm to Citizens Bank of PA of \$341.32. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: March 31, 2025 /s/Brian C. Thompson

Brian C. Thompson, Esquire

Attorney for Debtor PA I.D. # 91197

Thompson Law Group, P.C. 301 Smith Drive, Suite 6

Cranberry Township, PA 16066 (724) 799-8404 Telephone (724) 799-8409 Facsimile

bthompson@thompsonattorney.com